

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ERMIAS BETURE, ELISHA POLOMSKI,
and JAMES SAMUELSON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendant.

2:17-CV- 5757-SRC-CLW

STIPULATION

WHEREAS Plaintiffs Ermias Beture, Elisha Polomski and James Samuelson (“Plaintiffs”) served the Complaint on Defendant Samsung Electronics America, Inc. (“Samsung”) on August 16, 2017;

WHEREAS Samsung’s answer, motion or other response to the Complaint is currently due on September 6, 2017; and

WHEREAS Plaintiffs anticipate that they will amend the Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel on behalf of their respective clients, as follows:

1. No response to the Complaint by Samsung is necessary.
2. Plaintiffs shall file an Amended Complaint on or before September 20, 2017.
3. Samsung shall answer, move or otherwise respond to the Amended Complaint on or before October 31, 2017.

[signatures on following page]

KANTROWITZ, GOLDHAMER &
GRAIFMAN, P.C.

GREENBERG TRAURIG, LLP

/s/ Gary S. Graifman

Gary S. Graifman
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-and-

Nicholas A. Migliaccio (*pro hac vice*
application to follow)

Jason S. Rathod (*pro hac vice* application
to follow)

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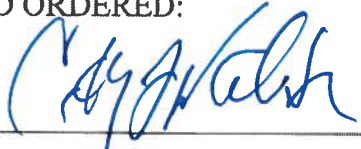
Robert Herrington (*pro hac vice* application
to follow)

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Los Angeles, CA 90067

*Attorneys for Defendant Samsung
Electronics America, Inc.*

Dated: September 5, 2017

SO ORDERED:



9/13/17

HON. STANLEY R. CHESLER

CATHY L. WALDON